### **REMARKS**

## Applicant's statement of substance of interview.

Applicants wish to express appreciation to Examiner Samuel Heinrich for the courtesy of an interview which was granted to Applicant's representative Michael Faibisch (Reg. No. 46,427). The interview was held at the USPTO on November 16, 2005. The Examiner's summary of the substance of the interview is set forth in the Interview Summary, Paper No. 11162005. During the interview, the independent claims were discussed vis-à-vis the Spann, Inegawa and Lissotschenko references. Applicant's representative pointed that out in the sited references, each beam has a fixed focal length between a beam steering mirror and the substrate, and that the corresponding focusing optical elements are fixed. No agreement was reached.

#### General remarks

Claims 188 – 191 are pending in the application. Claims 1 – 187 and 192 – 313 are canceled. Claim 188 is currently amended to include the substance of claim 192 which has been canceled without prejudice or disclaimer.

Applicant has carefully studied the outstanding Office Action in the present application. The present response is intended to be fully responsive to all points of rejection raised by the Examiner and is believed to place the application in condition for allowance. Favorable reconsideration and allowance of the application are respectfully requested.

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## Objection to the Specification

The disclosure is objected to because of informalities at page 25, line 24 (found in paragraph 117 of the published specification) page 26, line 32 (found in paragraph 120 of the published specification), and page 27 line 5 (found in paragraph 121 of the published specification).

The specification was not checked to the extent necessary to determine the presence of all possible minor errors.

Replacement paragraphs for paragraphs [005], [0016], [0093], [00106], [00117], [00120], [00121] and [00125] of the published specification, which include self-explanatory corrections for minor errors as shown above are submitted herewith.

Replacement paragraph 117 addresses the informality at page 25, line 24. Replacement paragraph 120 addresses the informality at page 26, line 32. Replacement paragraph 121 addresses the informality at page 27, line 5.

In view of the foregoing, the Examiner is respectfully requested to withdraw these informality objections.

#### Claims Rejections

Claims 188 - 192 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Spann (US6,491,361) in view of Inagawa et al. (US5,302,798).

Claims 188-192 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Lissotschenko (US Patent Application 20040196559A1) in view of Applicant's Admitted Prior Art.

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Applicants respectfully traverse the rejections as applied to the rejected claims.

Spann describes a digital media cutter, or printer including a rasterized laser illumination system in which the application of laser light may be controlled digitally. In a first embodiment, a single beam is scanned sequentially. In another embodiment, a separate laser (each outputting a laser beam) is provided for each mirror operative to direct a beam to a substrate. Spann fails to show moving focusing optical elements.

Inagawa et al. describes a method of forming holes in succession in a plurality of articles with a laser beam. The method employs retractable mirrors to move the beam among plural working optical axes. Working heads include a condenser lens to focus a parallel laser beam to a point. However, Inagawa fails to show moving the condenser.

Lissotschenko describes apparatus for applying laser radiation to an object, processing apparatus for processing an object, and printing apparatus for printing image information. The apparatus employs an array of focusing lens elements, however Lissotschenko fails to show moving the focusing lens elements.

Claim 188, as amended, now recites the following distinguishing recitation:

simultaneously outputting a plurality of laser beams from a laser beam source;

independently steering said plurality of laser beams to impinge on said electrical circuit substrate at independently selectable locations; and

focusing said plurality of laser beams to different independently selectable locations, said focusing comprising moving at least one optical element, without f-theta optical elements.

Nothing in the Spann, Inagawa, Lissotschenko or Applicant's Admitted Prior Art references, alone or in combination, shows or suggests focusing a "plurality of laser beams to different independently selectable locations, said focusing comprising moving at least one optical element, without f-theta optical elements" taken together with all of the distinguishing recitation of claim 188.

In view of the foregoing, Applicants respectfully request the Examiner to withdraw these rejections of claim 188 and its dependent claims 189 - 191.

## Conclusion and request for telephone interview

In view of the foregoing, this application is believed to be in order.

Reconsideration and allowance of this application are respectfully solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly invited to contact the undersigned attorney at the telephone number listed below.

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The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

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